

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUONG HOANG, an individual,

Plaintiff,

v.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

No. 2:11-CV-01709-MJP

DECLARATION OF TOM WHITCOMB

I, Tom Whitcomb, hereby declare as follows:

1. I am senior manager of software development at Defendant IMDb.com, Inc. ("IMDb") and have held this position since June 2008. I make this declaration based upon my personal knowledge and, if asked, would testify to the truth of the matters herein.

2. IMDb credit card payments are processed through Amazon.com, Inc.'s ("Amazon") payment processing technology. IMDb customer credit card information, including but not limited to the customer name and billing addresses, is encrypted when the information is comes from the browser in an SSL (secure socket layer) session. All IMDb customer credit card information, including the data relating to plaintiff Huong Hoang, is stored and transmitted using

WHITCOMB DECLARATION – 1

24976-0480/LEGAL25225644.1

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1 SSL encryption. SSL is the industry-standard cryptographic protocol that provides security for
2 Internet communications.
3

4 3. Aside from IMDb using Amazon's credit card processing technology, the
5 companies do not share or exchange customer information for any purpose. IMDb employees do
6 not have access to Amazon customer records, and Amazon.com employees do not have access to
7 IMDb customer records.
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12 I certify under penalty of perjury under the laws of the State of Washington that the
13 foregoing is true and correct.
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15 DATED at Sherman Oaks, California, this 28th day of November, 2012.
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/s/ Thomas W. Whitcomb

WHITCOMB DECLARATION - 2

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